

From: [Jennifer Gaines](#)
To: Gaines.jennifer@epa.gov
Subject: Fw: Follow-up to Last Week's Meeting on Rodenticides
Date: 05/31/2012 11:42 AM

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----- Forwarded by Jennifer Gaines/DC/USEPA/US on 05/31/2012 11:41 AM -----

From: Rosanna Louie-Juzwiak/DC/USEPA/US
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Cc: Russell Wasem/DC/USEPA/US@EPA
Date: 05/11/2011 11:52 AM
Subject: Fw: Follow-up to Last Week's Meeting on Rodenticides

Hey everyone - keeping you all in the loop...

Thanks,
Rosanna

----- Forwarded by Rosanna Louie-Juzwiak/DC/USEPA/US on 05/11/2011 11:51 AM -----

From: Bob Rosenberg <brosenberg@pestworld.org>
To: Neil Anderson/DC/USEPA/US@EPA, Rosanna Louie-Juzwiak/DC/USEPA/US@EPA, Russell Wasem/DC/USEPA/US@EPA
Cc: Richard Keigwin/DC/USEPA/US@EPA, Lois Rossi/DC/USEPA/US@EPA, Steven Bradbury/DC/USEPA/US@EPA
Date: 05/11/2011 11:46 AM
Subject: Follow-up to Last Week's Meeting on Rodenticides

Neil,

I want to again thank you, Rusty and Rosanna for taking time to meet with Gene and me last week to discuss NPMA's concerns about the rodenticide label revisions.

I. Prohibition Against Using Products for Non-Commensal Rodents

Per our visit, I've listed the names of the primary manufacturers of professional rodenticide products and links to their product labels. I believe you had asked for this information so that you could identify the universe of manufacturers to contact to request efficacy data on the effectiveness of these products in controlling non-commensal rodents.

As Gene and I explained, we support the Agency's desire to require efficacy data but are concerned that the manufacturers only recently became aware of this requirement and the failure to provide the manufacturers time to collect efficacy data on the control of non-commensal rodents such as deer and field mice and pack rats will result in the sudden loss of all the products pest management professionals rely upon to manage these and other non-commensal rodents.

II. Prohibition Against Using Products More than Fifty Feet From a Building

You also asked us to comment further on the issue of prohibiting the use of products more than 50 feet from a building. We believe this encompasses several issues:

1. We do not believe it was the intention of the RMD to prohibit the use of first-generation anticoagulants and non-anticoagulants by PMPs more than 50 feet from a building, provided they were applied in tamper resistant bait stations. We urge you to reconsider this prohibition which we do not believe is supported by data.

2. We also do not believe it was the intention of the RMD to prohibit the application by PMPs of any rodenticide to a rodent burrow more than 50 feet from a building and urge you to reconsider this prohibition which we also do not believe is supported by data.

3. We believe there are scenarios in which it is appropriate for a PMP to apply a second-generation anticoagulant more than 50 feet from a building, provided that it is applied in a tamper resistant bait station. The most prominent example is the application of products adjacent to dumpsters and trash receptacles located more than 50 feet from a building.

a. To rectify this issue, we suggest the issuance of a letter by the Agency stating that for the purposes of complying with rodenticide labels, EPA regards dumpsters and trash receptacles to be buildings, and

b. providing NPMA and other key stakeholders 60 days to commission an expert panel to identify appropriate scenarios where a similar exemption would apply

As we stated at the meeting, we believe that the Agency's implementation of the RMD will have profound impacts on public health and food safety and strongly urge you to address the concerns raised in this and previous communications.

Sincerely,

Bob

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Bob Rosenberg
Senior Vice President
National Pest Management Association
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